



## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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GRACE ROBINSON CHAN  
Chief Engineer and General Manager

October 22, 2013  
File No.: 31-380.10

Dr. Steven Cliff  
California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, California 95812

Dear Dr. Cliff:

Via Email:

**Subject: Comments – Proposed Changes to the California Greenhouse Gas  
Cap and Trade Regulations**

The Sanitation Districts of Los Angeles County (LACSD) appreciate the opportunity to comment on the proposed changes to the California Greenhouse Gas Cap and Trade Regulations. The Sanitation Districts provide essential wastewater and solid waste management services for about 5.7 million people in Los Angeles County while minimizing harmful emissions and maximizing renewable energy. Our comments are focused on the waste-to-energy provisions of the proposed changes.

LACSD fully support the proposed exclusion of the existing waste-to-energy facilities from compliance obligations for the first compliance period while a comprehensive approach for handling the solid waste management sector under the cap is studied. This approach is consistent with CARB Board Resolutions 11-32 and 12-33.

While the proposed language is consistent with the direction provided in Resolutions 11-32 and 12-33, proposed language in the Initial Statement of Reasons (SOR) contradicts the actual proposed regulatory language. Specifically, we refer you to the following language on page 29 of the SOR:

***“In order to obtain the exemption, facilities must report and verify their emissions. In addition the electricity must be placed on the California grid and not used to meet the facilities internal load.”***

It is standard business practice for all facilities that generate electricity to utilize a portion of the generated energy to power internal loads, with the net electricity directed to the grid. This language has the unintended consequence of disqualifying the existing waste-to-energy facilities from the exemption proposed in the cap-and-trade language. It is our understanding that this was not the intent of staff. Therefore, to be consistent with the proposed regulatory language we recommend the language be modified as follows:

***"In order to obtain the exemption, facilities must report and verify their emissions. ~~In addition the electricity must be placed on the California grid and not used to meet the facilities internal load.~~"***

LACSD appreciates the opportunity to provide comment on the proposed changes to the Cap-and-Trade Regulatory language. Please contact the undersigned at this office with any questions or comments.

Very truly yours,

Grace Robinson Chan

A handwritten signature in black ink, appearing to read "Frank R. Caponi", with a long horizontal line extending from the left side of the signature.

Frank R. Caponi  
Division Engineer  
Air Quality Engineering  
Technical Services Department

FRC:bb

cc: Mike Tollstrup, ARB  
Claudia Orlando, ARB